



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

WMP/JMK/AES
F.#2014R00501

*271 Cadman Plaza East
Brooklyn, New York 11201*

October 13, 2016

By Hand and ECF

Honorable Kiyo A. Matsumoto
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Martin Shkreli et al.
Criminal Docket No. 15-637 (KAM)

Dear Judge Matsumoto:

Enclosed please find stipulations and proposed orders governing discovery materials from the firm Marcum LLP ("Marcum") provided by the government in the above-captioned case, which have been signed by (1) the government and defendant Martin Shkreli on September 9, 2016, and (2) the government and defendant Evan Greebel on September 23, 2016. The stipulations provide additional protection for confidential and proprietary information in those materials, and also provides for the return of laptops provided by Marcum at the conclusion of the case. The government respectfully requests that the Court so order these stipulations.

Respectfully submitted,

ROBERT L. CAPERS
United States Attorney

By: /s/ Alixandra Smith
Winston Paes
Alixandra Smith
Assistant U.S. Attorneys
(718) 254-6023/6370

cc: All counsel (via ECF)